

# Exhibit A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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x  
Rio Tinto plc, :  
: :  
Plaintiff, : Civil Action No. 14-cv-3042 (RMB)  
: :  
v. :  
: :  
: :  
Vale S.A., Benjamin Steinmetz, BSG :  
Resources Limited, VBG-Vale BSGR :  
Limited aka BSG Resources (Guinea) Ltd. :  
aka BSG Resources Guinée Ltd, BSG :  
Resources Guinée SARL aka BSG :  
Resources (Guinea) SARL aka VBG-Vale :  
BSGR, Frederic Cilins, Mamadie Touré, :  
and Mahmoud Thiam, :  
: :  
Defendants. :  
: :  
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x

**DECLARATION OF BENJAMIN STEINMETZ**

I, Benjamin Steinmetz, the undersigned, hereby declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am a citizen of both Israel and France, and reside in Geneva, Switzerland. I was named as a defendant in the above-caption action (“Action”), and I am fully familiar with the facts and circumstances set forth herein.

2. I respectfully submit this Declaration: (i) pursuant to Magistrate Judge Andrew J. Peck’s December 9, 2014 Order, providing, in part, that I submit a sworn statement declaring that I do not and did not “own ... any real estate ... [or] any property of any sort in New York ... within six months around the filing of the complaint in both directions” (“Order”); and (ii) in support of my motion to dismiss, pursuant to Fed. R. Civ. P. 12(b)(2), on the ground that this Court lacks personal jurisdiction over me.



3. I understand that Magistrate Judge Peck's Order requires that my response herein be strictly confined to the period spanning October 31, 2013 through October 31, 2014. My assertions in this Declaration are made in accordance with that Order.

4. Plaintiff's Complaint, as amended on August 15, 2014 ("Amended Complaint"), alleges in paragraph 20 that I maintain a business address at 580 Fifth Avenue, Apartment 417, New York, New York. This allegation is untrue.

5. I did not, and do not, maintain a business address at 580 Fifth Avenue, Apartment 417, New York, New York, and I do not maintain a business address or conduct business anywhere else in the State of New York or in the United States.

6. Furthermore, I do not have any ownership interest in 580 Fifth Avenue, Apartment 417, New York, New York, or in any other commercial real estate property in the State of New York or elsewhere in the United States.

7. Plaintiff's Amended Complaint further alleges in Paragraph 20 that I maintain a residence at 781 Fifth Avenue, Apartment 701, New York, New York. This allegation is also untrue.

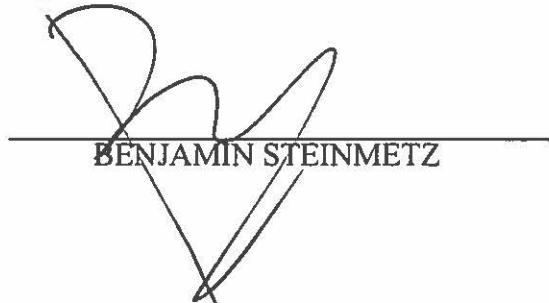
8. I did not, and do not, maintain a residence at 781 Fifth Avenue, Apartment 701, New York, New York, and I do not maintain a residence anywhere else in the State of New York or in the United States.

9. Furthermore, I do not have any ownership interest in 781 Fifth Avenue, Apartment 701, New York, New York, or in any other residential real estate property in the State of New York or elsewhere in the United States.

A handwritten signature in black ink, appearing to read "B. W." or a similar initials.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of January, 2015 at London, England.



A handwritten signature in black ink, appearing to read "BENJAMIN STEINMETZ", is written over a horizontal line. The signature is fluid and cursive, with a large loop on the left and smaller loops on the right.